



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

JUN - 7 2016

OFFICE OF
COMPLIANCE AND ENFORCEMENT

Reply To: OCE-101

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Mr. Richard F. Goodson
Registered Agent
Dickinson Frozen Foods, Inc.
877 Main Street, Suite 1000
Hawley, Troxell, Ennis & Hawley
Boise, Idaho 83702

Re: Request for Information Regarding the Dickinson Frozen Foods, Inc., facility located at
903 East 3000 North, Sugar City, Idaho

Dear Mr. Goodson:

The United States Environmental Protection Agency (EPA) is seeking information and documents relating to the environmental conditions at the Dickinson Frozen Foods, Inc. facility located at 903 East 3000 North, Sugar City, Idaho (the facility). Pursuant to the authority of Section 114 of the Clean Air Act (CAA), 42 U.S.C. § 7414, you are hereby requested to respond to the Information Request (Enclosure 1).

This is a follow up to EPA's March 13, 2014 Information Request to the facility and requests information concerning the presence and amount of CAA 112(r) regulated substances at the facility. A list of CAA 122(r) regulated substances is provided in Enclosure 2. Please have the enclosed Statement of Certification (Enclosure 3) signed by a duly authorized officer or agent and returned with the responses to this Information Request.

Also enclosed is a copy of EPA's Small Business Regulatory Enforcement and Fairness Act information sheet, which provides information on compliance assistance that may be helpful to you (Enclosure 4).

While EPA seeks your voluntary cooperation in this investigation, compliance with the Information Request is required by law. Failure to provide complete and truthful responses to this Information Request within **thirty (30) days** of your receipt of the request, or to adequately justify such failure to respond, may subject you to an enforcement action by the EPA pursuant to Section 113(a)(3) of the CAA. This statute permits the EPA to seek the imposition of penalties of up to \$37,500 for each day of non-compliance.

Please note that responses which are incomplete, ambiguous, or evasive may be treated as non-compliance with the Information Request. If you believe a question is not applicable to the facility, explain in detail the reason for that belief. Be further advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001 or Section 113(c)(2) of the CAA, 42 U.S.C. § 7413(C)(2).

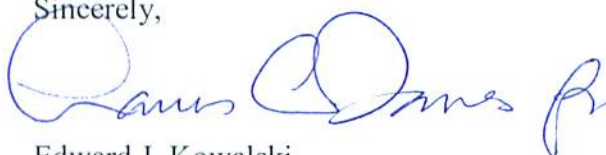
A complete copy of all responses should be sent to:

Javier Morales
Office of Compliance and Enforcement
U.S. EPA, Region 10
1200 Sixth Avenue, Suite 900, OCE-101
Seattle, Washington 98101

Due to the legal ramifications of your failure to respond properly and promptly, EPA strongly encourages you to give this matter your immediate attention and to respond to this Information Request within the time frame specified above, unless prior to the date, you send a written request and receive approval from the EPA for an alternate date.

If you have any questions regarding this request, please contact Javier Morales in the Office of Compliance and Enforcement at (206) 553-1255 for technical matters or Julie Vergeront in the Office of Regional Counsel at (206) 553-1497 for legal matters.

Sincerely,



Edward J. Kowalski
Director

Enclosures

ENCLOSURE 1
CAA Section 112(r) Information Request

A. INSTRUCTIONS

1. Please provide a separate narrative response to each question and subpart of a question set forth in this Information Request, with the number of the question to which it corresponds.
2. For each question contained herein, identify each document consulted, examined, or referred to in the preparation of the response or that contains information responsive to the question, and provide a true and correct copy of each such document if not provided in response to another specific request herein.
3. Indicate on each document produced in response to this Information Request, or in another reasonable manner, the number of the question to which it corresponds.
4. If requested information or documents are not known or are not available to you at the time of your response to this Information Request, but later become known or available to you, you must supplement your response to EPA. Moreover, should you find at any time after submission of your response that any portion is or becomes false, incomplete, or misrepresents the facts, you must provide EPA with a corrected response as soon as possible.
5. The information requested herein must be provided whether or not you regard part or all of it as a trade secret or confidential business information. You may, if you desire, assert a business confidentiality claim covering all or part of the information submitted pursuant to Section 114 of the Clean Air Act, 42 U.S.C. § 7414, and 40 C.F.R. Part 2, by labeling such information at the time it is submitted to EPA as "trade secret" or "proprietary" or "company confidential" or other suitable notice.

The information covered by such a claim will be disclosed by EPA only to the extent and by the procedures set forth in statutes and 40 C.F.R. Part 2, Subpart B. Additional rules governing certain information obtained under the CAA appear in 40 C.F.R. § 2.301. Unless you make a claim at the time that you submit the information in the manner described in 40 C.F.R. § 2.203(b), it may be made available to the public by EPA without further notice to you. Information subject to a business confidentiality claim may be disclosed by EPA only to the extent set forth in the above-cited regulations. You should read 40 C.F.R. Part 2 carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim.

B. DEFINITIONS

The following definitions apply to this Information Request. All terms not defined herein shall have their ordinary meaning unless such terms are defined in the Clean Air Act or in the regulations at 40 C.F.R. Part 68.

1. The "company" refers to either the owner or operator of the facility, or both. If a question would have a different response because the owner and operator are different entities, the response shall be made in relation to both.
2. The term "document" means any object that records, stores, or presents information, and includes writings, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hard copy, including any form or format of these. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary

documentation and support. All documents in hard copy should also include: (a) any copy of each document which is not an exact duplicate of a document which is produced, (b) each copy which has any writing, notation, or the like on it, (c) drafts, (d) attachments to or enclosures with any document, and (e) every other document referred to or incorporated into each document.

3. The terms "identify" and "describe" mean, with respect to a corporation, partnership, business trust, or other association or business entity (including a sole association or sole proprietorship), to set forth its full name, address, legal form (e.g., corporation, partnership, etc.), registered agent, organization, if any, and a brief description of its business.
4. The terms "identify" and "describe" mean, with respect to a natural person, to set forth the person's name, present or last known business address and business telephone number, present or last known home address and home telephone number, and present or last known job title, position, or business.
5. The terms "identify" and "describe" mean, with respect to a document, to provide its customary business description, its date, its number, if any (catalog, index, storage, invoice or purchase order number), the identity of the author, addressor, addressee and/or recipient, the substance, and the subject matter.
6. The terms "person" or "entity" shall have the same definition as "person" as defined in Section 302(e) of the Clean Air Act, and shall include any individual, association, corporation, partnership, or any federal, state, or local governmental entity.
7. The terms "you" or "Respondent" mean, the addressee of this Request, and the addressee's subsidiaries, divisions, officers, directors, managers, employees, contractors, trustees, partners, successors, assigns, attorneys, and agents, as applicable.
8. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this information request any information which might otherwise be construed to be outside its scope.
9. The term "vessel," as defined in 40 C.F.R. § 68.3, means any reactor, tank, drum, barrel, cylinder, vat, kettle, boiler, pipe, hose, or other container.
10. The term "regulated substance," as defined in 40 C.F.R. § 68.3, means any substance listed pursuant to Section 112(r)(3) of the Clean Air Act as amended in 40 C.F.R. § 68.130. Enclosure 2 provides this list of regulated substances and their threshold quantities.
11. The term "process," as defined in 40 C.F.R. § 68.3, means any activity involving a regulated substance including any use, storage, manufacturing, handling, or on-site movement of such substances, or combination of these activities. For the purposes of this definition, any group of vessels that are interconnected, or separate vessels that are located such that a regulated substance could be involved in a potential release, shall be considered a single process.
12. The term "process equipment" means all equipment used in the process.

13. The term “stationary source,” as defined in 40 C.F.R. § 68.3, means any buildings, structures, equipment, installations, or substance emitting stationary activities which belong to the same industrial group, which are located on one or more contiguous properties, which are under the control of the same person (or persons under common control), and from which an accidental release may occur. The term stationary source does not apply to transportation, including storage incident to transportation, of any regulated substance or any other extremely hazardous substance under the provisions of 40 C.F.R. Part 68. A stationary source includes transportation containers used for storage not incident to transportation and transportation containers connected to equipment at a stationary source for loading or unloading. Transportation includes, but is not limited to, transportation subject to oversight or regulation under 49 C.F.R. Parts 192, 193, or 195, or a state natural gas or hazardous liquid program for which the state has in effect a certification to Department of Transportation under 49 U.S.C. Section 60105. A stationary source does not include naturally occurring hydrocarbon reservoirs. Properties shall not be considered contiguous solely because of a railroad or pipeline right-of-way.
14. The term “threshold quantity,” as defined in 40 C.F.R. § 68.3, means the quantity specified for regulated substances pursuant to Section 112(r)(5) of the Clean Air Act as amended, listed in 40 C.F.R. § 68.130 and determined to be present at a stationary source. A threshold quantity of a regulated substance listed in 40 C.F.R. § 68.130 is present at a stationary source if the total quantity of the regulated substance contained in a process exceeds the threshold. For the purposes of determining whether more than a threshold quantity of a regulated substance is present at the stationary source, the exemptions in 40 C.F.R. § 68.115 apply. Enclosure 2 provides this list of regulated substances and their threshold quantities.
15. The term “Risk Management Plan” means the plan required by 40 C.F.R. Part 68, Subpart G if a stationary source has more than a threshold quantity of a regulated substance in a process.
16. The term “facility” means the property owned or operated by Dickinson Frozen Foods, Inc., located at 903 East 3000 N, Sugar City, Idaho 83448.
17. “First Information Request” means the Information Request issued by EPA to the company regarding the facility dated March 13, 2014.
18. “First Information Request Response” means the company’s April 2014 response to EPA’s First Information Request.
19. The term “Line A refrigeration system” means the ammonia refrigeration system referred to by the company in its First Information Request Response as the “Line A refrigeration system” or the “A-Line ammonia system,” and specifically including the high pressure receiver, evaporators, low pressure receiver, compressors, oil separators, liquid ammonia pumps, piping, freezer tunnels, and all other process equipment in the engine room associated with the Line A refrigeration system.
20. The term “Line B refrigeration system” means the ammonia refrigeration system referred to by the company in its First Information Request Response as the “Line B refrigeration system” or the “B-Line ammonia system,” and specifically including the high pressure receiver, evaporators, low pressure receiver, compressors, oil separators, liquid ammonia pumps, piping, freezer tunnels, and all other process equipment in the engine room associated with the Line B refrigeration system.
21. Words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions.

C. INFORMATION REQUEST

Provide the following information for the facility. Unless otherwise specified, provide all responsive information from the time period between June 1, 2011 and the date of this Information Request.

1. For each of questions 1-7 of Enclosure 1 of the First Information Request, either confirm that the response to the question in the First Information Request Response remains true, accurate and complete, or submit a revised and current response to the question that is true, accurate, and complete. If you are providing a revised response to a question based on process, operational, or other changes at the facility since submission of the First Information Request Response, describe in detail the process, operational, or other changes at the facility, including what changes were made and when they were made.
2. Explain whether there is or has ever been any interconnection between the Line A refrigeration system and the Line B refrigeration system at the facility, including any hoses connecting the two systems. For each period of time during which the Line A and Line B refrigeration systems have been connected, identify the date and duration of the connection, how the systems were connected (e.g., hose, piping), who authorized the connection, and the amount of ammonia in each refrigeration system at the time of the connection. Provide supporting documentation.
3. Provide all records of anhydrous ammonia purchases for the facility, including but not limited to invoices, receipts, bills of lading, the date of each delivery, the amount of each delivery, and ammonia charging records.
4. Provide the maximum intended inventory calculations (i.e., maximum capacity) for anhydrous ammonia prepared by Kemper Northwest for the Line A refrigeration system and for the Line B refrigeration system at the facility.
5. Provide the maximum intended inventory calculations (i.e., maximum capacity) and maximum as operated inventory calculations for anhydrous ammonia prepared by the company for the Line A refrigeration system and for the Line B refrigeration system at the facility. In these calculations, specifically include all process equipment containing anhydrous ammonia for each system, including the high pressure receiver, evaporators, low pressure receiver, compressors, oil separators, liquid ammonia pumps, piping, freezer tunnels, and all other process equipment in the engine room associated with the specific (i.e., Line A or Line B) refrigeration system.
6. Provide the operating procedures for the Line A and Line B refrigeration systems at the facility.
7. Describe the distance and type of physical barrier, such as a fire wall or barricade to contain the blast waves from explosions, between the engine room for the Line A refrigeration system and the engine room for the Line B refrigeration system relative to each other. Provide supporting documentation, including engineering or other drawings or analysis showing that the physical barrier was designed as a fire wall or as a barricade to contain blast waves from explosions.
8. Explain whether a potential catastrophic release at one refrigeration system at the facility or an external event (such as a fire or explosion) affecting one refrigeration system at the facility could have an impact on the integrity of process equipment at the other refrigeration system at the facility. Provide supporting documentation, including any hazard analysis conducted by or on behalf of the company regarding such potential events.

9. Describe the facility's procedures for notifying emergency responders when there is a need for an emergency response in the event of an ammonia release. Provide supporting documentation.
10. Describe the training provided to employees who are responsible for responding to an ammonia release at the facility. Provide supporting documentation, including employee training records.
11. Describe what coordination and communications the facility has had with local emergency responders to include the facility in the community emergency response plan. Provide supporting documentation of this coordination.
12. Provide the reports for all the incident investigations related to ammonia releases at the facility since the date of the First Information Request Response, including documentation on all resolutions and corrective actions of all such incident investigation report findings and recommendations.

ENCLOSURE 2
Threshold Quantities for CAA Section 112(r)

| CAS # | Regulated Substance | TQ (Lbs) | TQ (CF) | TQ (Gal) |
|--------------|-------------------------------------|-----------------|----------------|-----------------|
| 107-02-8 | Acrolein | 5,000 | | 717 |
| 107-13-1 | Acrylonitrile | 20,000 | | 3,012 |
| 814-68-6 | Acrylyl chloride | 5,000 | | |
| 107-18-6 | Allyl alcohol | 15,000 | | 2,126 |
| 107-11-9 | Allylamine | 10,000 | | 1,798 |
| 7664-41-7 | Ammonia (anhydrous) | 10,000 | 415,600 | 1,565 |
| 7664-41-7 | Ammonia (\geq conc. 20%) | 20,000 | | 3,912 |
| 7784-34-1 | Arsenous trichloride | 15,000 | | 841 |
| 7784-42-1 | Arsine | 1,000 | 5,000 | 45 |
| 10294-34-5 | Boron trichloride | 5,000 | 16,500 | 816 |
| 7637-07-2 | Boron trifluoride | 5,000 | 28,000 | 384 |
| 353-42-4 | Boron trifluoride compound | | | |
| | with methyl ether (1:1) | 15,000 | | 1,238 |
| 7726-95-6 | Bromine | 10,000 | | 386 |
| 75-15-0 | Carbon disulfide | 20,000 | | 1,854 |
| 7782-50-5 | Chlorine | 2,500 | 41,239 | 193 |
| 10049-04-4 | Chlorine dioxide | 1,000 | 41,239 | 80 |
| 67-66-3 | Chloroform | 20,000 | | 1,618 |
| 542-88-1 | Chloromethyl ether | 1,000 | | 564 |
| 107-30-2 | Chloromethyl methyl ether | 5,000 | | |
| 4170-30-3 | Crotonaldehyde | 20,000 | | 2,935 |
| 123-73-9 | Crotonaldehyde, (E)- | 20,000 | | 2,802 |
| 506-77-4 | Cyanogen chloride ((CN)Cl) | 10,000 | 280,266 | 1,004 |
| 108-91-8 | Cyclohexylamine | 15,000 | | 2,077 |
| 19287-45-7 | Diborane | 2,500 | 35,125 | |
| 75-78-5 | Dimethyldichlorosilane | 5,000 | | 560 |
| 57-14-7 | 1,1-Dimethylhydrazine | 15,000 | | 2,285 |
| 106-89-8 | Epichlorohydrin | 20,000 | | 2,037 |
| 107-15-3 | Ethylenediamine | 20,000 | | 2,677 |
| 151-56-4 | Ethyleneimine | 10,000 | | 1,448 |
| 75-21-8 | Ethylene oxide | 10,000 | 87,800 | 1,385 |
| 7782-41-4 | Fluorine | 1,000 | 10,170 | 109 |
| 50-00-0 | Formaldehyde (solution) | 15,000 | | 2,217 |
| 110-00-9 | Furan | 5,000 | | 644 |
| 302-01-2 | Hydrazine | 15,000 | | 1,800 |
| 7647-01-0 | Hydrochloric acid | | | |
| | (\geq conc. 37%) | 15,000 | | 1,689 |
| 74-90-8 | Hydrocyanic acid/Hydrogen cyanide | 2,500 | | 437 |
| 7647-01-0 | Hydrogen chloride (anhydrous) | 5,000 | 54,500 | 475 |
| 7664-39-3 | Hydrogen fluoride/Hydrofluoric acid | | | |
| | (\geq conc. 50%) | 1,000 | | 105 |
| 7783-07-5 | Hydrogen selenide | 500 | | 28 |
| 7783-06-4 | Hydrogen sulfide | 10,000 | 266,920 | 1,017 |
| 13463-40-6 | Iron, pentacarbonyl- | 2,500 | | 202 |
| 78-82-0 | Isobutyronitrile | 20,000 | | 3,171 |
| 108-23-6 | Isopropyl chloroformate | 15,000 | | |
| 126-98-7 | Methacrylonitrile | 10,000 | | 1,506 |
| 74-87-3 | Methyl chloride | 10,000 | 75,000 | 1,310 |
| 79-22-1 | Methyl chloroformate | 5,000 | | 493 |
| 60-34-4 | Methyl hydrazine | 15,000 | | 2,068 |

Abbreviations: TQ – Threshold Quantity, Lbs - Pounds, CF - Cubic Feet & Gal – Gallons

ENCLOSURE 2
Threshold Quantities for CAA Section 112(r)

| CAS # | Regulated Substance | TQ (Lbs) | TQ (CF) | TQ (Gal) |
|--------------|------------------------------|-----------------|----------------|-----------------|
| 624-83-9 | Methyl isocyanate | 10,000 | | 1,255 |
| 74-93-1 | Methyl mercaptan | 10,000 | 116,110 | 1,385 |
| 556-64-9 | Methyl thiocyanate | 20,000 | | |
| 75-79-6 | Methyltrichlorosilane | 5,000 | | 473 |
| 13463-39-3 | Nickel carbonyl | 1,000 | | 91 |
| 7697-37-2 | Nitric acid (>= conc. 80%) | 15,000 | | 1,202 |
| 10102-43-9 | Nitric oxide | 10,000 | 130,000 | 949 |
| 8014-95-7 | Oleum (fuming sulfuric acid) | 10,000 | | |
| 79-21-0 | Peracetic acid | 10,000 | | 1,048 |
| 594-42-3 | Perchloromethyl mercaptan | 10,000 | | 700 |
| 75-44-5 | Phosgene | 500 | 1,950 | 43 |
| 7803-51-2 | Phosphine | 5,000 | 79,008 | 508 |
| 10025-87-3 | Phosphorus oxychloride | 5,000 | | 359 |
| 7719-12-2 | Phosphorus trichloride | 15,000 | | |
| 110-89-4 | Piperidine | 15,000 | | 2,097 |
| 107-12-0 | Propionitrile | 10,000 | | 1,545 |
| 109-61-5 | Propyl chloroformate | 15,000 | | |
| 75-55-8 | Propyleneimine | 10,000 | | 1,506 |
| 75-56-9 | Propylene oxide | 10,000 | | 1,403 |
| 7446-09-5 | Sulfur dioxide (anhydrous) | 5,000 | 29,950 | 413 |
| 7783-60-0 | Sulfur tetrafluoride | 2,500 | | |
| 7446-11-9 | Sulfur trioxide | 10,000 | | 628 |
| 75-74-1 | Tetramethyllead | 10,000 | | 604 |
| 509-14-8 | Tetranitromethane | 10,000 | | 735 |
| 7550-45-0 | Titanium tetrachloride | 2,500 | | 175 |
| 584-84-9 | Toluene 2,4-diisocyanate | 10,000 | | 984 |
| 91-08-7 | Toluene 2,6-diisocyanate | 10,000 | | |
| 26471-62-5 | Toluene diisocyanate | | | |
| | (mixed isomers) | 10,000 | | 984 |
| 75-77-4 | Trimethylchlorosilane | 10,000 | | 1,401 |
| 108-05-4 | Vinyl acetate monomer | 15,000 | | 1,407 |
| 75-07-0 | Acetaldehyde | 10,000 | | 1,545 |
| 74-86-2 | Acetylene | 10,000 | 147,000 | 1,950 |
| 598-73-2 | Bromotrifluoroethylene | 10,000 | | |
| 106-99-0 | 1,3-Butadiene | 10,000 | 69,000 | 1,854 |
| 106-97-8 | Butane | 10,000 | 63,356 | 2,008 |
| 106-98-9 | 1-Butene | 10,000 | 65,510 | 272 |
| 107-01-7 | 2-Butene | 10,000 | | |
| 25167-67-3 | Butene | 10,000 | | |
| 590-18-1 | 2-Butene-cis | 10,000 | 65,230 | 259 |
| 624-64-6 | 2-Butene-trans | 10,000 | 65,245 | 267 |
| 463-58-1 | Carbon oxysulfide | 10,000 | 280,266 | 574 |
| 7791-21-1 | Chlorine monoxide | 10,000 | | |
| 557-98-2 | 2-Chloropropylene | 10,000 | | 1,279 |
| 590-21-6 | 1-Chloropropylene | 10,000 | | 1,279 |
| 460-19-5 | Cyanogen | 10,000 | 241,082 | |
| 75-19-4 | Cyclopropane | 10,000 | 100,762 | 1,673 |
| 4109-96-0 | Dichlorosilane | 10,000 | 464,441 | |
| 75-37-6 | Difluoroethane | 10,000 | 57,400 | 502 |
| 124-40-3 | Dimethylamine | 10,000 | 86,000 | 1,772 |

Abbreviations: TQ – Threshold Quantity, Lbs - Pounds, CF - Cubic Feet & Gal – Gallons

ENCLOSURE 2
Threshold Quantities for CAA Section 112(r)

| CAS # | Regulated Substance | TQ (Lbs) | TQ (CF) | TQ (Gal) |
|--------------|----------------------------|-----------------|----------------|-----------------|
| 463-82-1 | 2,2-Dimethylpropane | 10,000 | 78,875 | |
| 74-84-0 | Ethane | 10,000 | 125,151 | 2,677 |
| 107-00-6 | Ethyl acetylene | 10,000 | 72,000 | 1,792 |
| 75-04-7 | Ethylamine | 10,000 | | 1,754 |
| 75-00-3 | Ethyl chloride | 10,000 | 44,042 | 1,310 |
| 74-85-1 | Ethylene | 10,000 | 127,000 | 2,114 |
| 60-29-7 | Ethyl ether | 10,000 | | 1,697 |
| 75-08-1 | Ethyl mercaptan | 10,000 | | |
| 109-95-5 | Ethyl nitrite | 10,000 | | |
| 1333-74-0 | Hydrogen | 10,000 | 1,920,000 | 16,900 |
| 75-28-5 | Isobutane | 10,000 | 63,355 | 2,077 |
| 78-78-4 | Isopentane | 10,000 | | 1,943 |
| 78-79-5 | Isoprene | 10,000 | | 1,769 |
| 75-31-0 | Isopropylamine | 10,000 | | 1,746 |
| 75-29-6 | Isopropyl chloride | 10,000 | | 1,398 |
| 74-82-8 | Methane | 10,000 | 236,113 | 2,175 |
| 74-89-5 | Methylamine | 10,000 | 121,000 | 1,336 |
| 563-45-1 | 3-Methyl-1-butene | 10,000 | 83,706 | 879 |
| 563-46-2 | 2-Methyl-1-butene | 10,000 | | |
| 115-10-6 | Methyl ether | 10,000 | 88,217 | 1,823 |
| 107-31-3 | Methyl formate | 10,000 | | 1,229 |
| 115-11-7 | 2-Methylpropene | 10,000 | 80,076 | 2,000 |
| 504-60-9 | 1,3-Pentadiene | 10,000 | | 1,828 |
| 109-66-0 | Pentane | 10,000 | | 1,923 |
| 109-67-1 | 1-Pentene | 10,000 | | 1,883 |
| 646-04-8 | 2-Pentene, (E)- | 10,000 | | 1,883 |
| 627-20-3 | 2-Pentene, (Z)- | 10,000 | | 1,883 |
| 463-49-0 | Propadiene | 10,000 | | |
| 74-98-6 | Propane | 10,000 | 84,515 | 2,358 |
| 115-07-1 | Propylene | 10,000 | 88,750 | 2,362 |
| 74-99-7 | Propyne | 10,000 | 97,000 | |
| 7803-62-5 | Silane | 10,000 | 120,000 | 1,772 |
| 116-14-3 | Tetrafluoroethylene | 10,000 | | |
| 75-76-3 | Tetramethylsilane | 10,000 | | 1,859 |
| 10025-78-2 | Trichlorosilane | 10,000 | | 1,012 |
| 79-38-9 | Trifluorochloroethylene | 10,000 | 174,165 | 898 |
| 75-50-3 | Trimethylamine | 10,000 | 64,000 | 1,812 |
| 689-97-4 | Vinyl acetylene | 10,000 | 91,647 | 1,939 |
| 75-01-4 | Vinyl chloride | 10,000 | 62,500 | 1,316 |
| 109-92-2 | Vinyl ethyl ether | 10,000 | | 1,321 |
| 75-02-5 | Vinyl fluoride | 10,000 | | 1,557 |
| 75-35-4 | Vinylidene chloride | 10,000 | | |
| 75-38-7 | Vinylidene fluoride | 10,000 | 82,345 | 1,946 |
| 107-25-5 | Vinyl methyl ether | 10,000 | 100,095 | 1,600 |

Abbreviations: TQ – Threshold Quantity, Lbs - Pounds, CF - Cubic Feet & Gal – Gallons

ENCLOSURE 3

Dickinson Frozen Foods, Inc.
903 East 3000 North
Sugar City, Idaho 83448

CAA Section 114
Information Request

STATEMENT OF CERTIFICATION

I certify that the enclosed responses to EPA's Information Request issued to Dickinson Frozen Foods, Inc. are true, accurate, and complete. I certify that the portions of these responses which I did not personally prepare were prepared by persons acting on behalf of Dickinson Frozen Foods, Inc. under my supervision and at my instruction, and that the information provided is true, accurate, and complete. I am aware that there are significant penalties for submitting false information in response to this Information Request, including the possibility of fine and imprisonment.

Signature

Printed Name

Title

Date



U.S. EPA Small Business Resources Information Sheet

The United States Environmental Protection Agency provides an array of resources to help small businesses understand and comply with federal and state environmental laws. In addition to helping small businesses understand their environmental obligations and improve compliance, these resources will also help such businesses find cost-effective ways to comply through pollution prevention techniques and innovative technologies.

Small Business Programs

www.epa.gov/smallbusiness
EPA's Office of Small Business Programs (OSBP) advocates and fosters opportunities for direct and indirect partnerships, contracts, and sub-agreements for small businesses and socio-economically disadvantaged businesses.

EPA's Asbestos Small Business Ombudsman

www.epa.gov/sbo or 1-800-368-5888
The EPA Asbestos and Small Business Ombudsman (ASBO) serves as a conduit for small businesses to access EPA and facilitates communications between the small business community and the Agency.

EPA's Compliance Assistance Homepage

www2.epa.gov/compliance
This page is a gateway industry and statute-specific environmental resources, from extensive web-based information to hotlines and compliance assistance specialists.

EPA's Compliance Assistance Centers

www.assistancecenters.net
EPA's Compliance Assistance Centers provide information targeted to industries with many small businesses. They were developed in partnership with industry, universities and other federal and state agencies.

Agriculture

www.epa.gov/agriculture/

Automotive Recycling

www.ecarcenter.org

Automotive Service and Repair

ccar-greenlink.org/ or 1-888-GRN-LINK

Chemical Manufacturing

www.chemalliance.org

Construction

www.cicacenter.org or 1-734-995-4911

Education

www.campuserc.org

Food Processing

www.fpeac.org

Healthcare

www.hercenter.org

Local Government

www.lgean.org

Metal Finishing

www.nmfrc.org

Paints and Coatings

www.paintcenter.org

Printing

www.pneac.org

Ports

www.portcompliance.org

Transportation

www.tercenter.org

U.S. Border Compliance and Import/Export Issues

www.bordercenter.org

EPA Hotlines, Helplines and Clearinghouses

www2.epa.gov/home/epa-hotlines
EPA sponsors many free hotlines and clearinghouses that provide convenient assistance regarding environmental requirements. Some examples are:

Clean Air Technology Center (CATC) Info-line

www.epa.gov/ttn/catc or 1-919-541-0800

Superfund, TRI, EPCRA, RMP and Oil Information Center

www.epa.gov/superfund/contacts/infocenter/index.htm or 1-800-424-9346

EPA Imported Vehicles and Engines Public Helpline

www.epa.gov/otaq/imports or 734-214-4100

National Pesticide Information Center

www.npic.orst.edu/ or 1-800-858-7378

National Response Center

Hotline to report oil and hazardous substance spills - www.nrc.uscg.mil or 1-800-424-8802

Pollution Prevention Information Clearinghouse (PPIC) -

www.epa.gov/opptintr/ppic or 1-202-566-0799

Safe Drinking Water Hotline -

www.epa.gov/drink/hotline/index.cfm or 1-800-426-4791

Stratospheric Ozone Protection Hotline

www.epa.gov/ozone/comments.htm or 1-800-296-1996

Toxic Substances Control Act (TSCA) Hotline

tsc-hotline@epa.gov or 1-202-554-1404

Small Entity Compliance Guides

<http://www.epa.gov/sbrefa/compliance-guides.html>

EPA publishes a Small Entity Compliance Guide (SECG) for every rule for which the Agency has prepared a final regulatory flexibility analysis, in accordance with Section 604 of the Regulatory Flexibility Act (RFA).

Regional Small Business Liaisons

<http://www.epa.gov/sbo/rsbl.htm>

The U.S. Environmental Protection Agency (EPA) Regional Small Business Liaison (RSBL) is the primary regional contact and often the expert on small business assistance, advocacy, and outreach. The RSBL is the regional voice for the EPA Asbestos and Small Business Ombudsman (ASBO).

State Resource Locators

www.envcap.org/statetools

The Locators provide state-specific contacts, regulations and resources covering the major environmental laws.

State Small Business Environmental Assistance Programs (SBEAPs)

www.epa.gov/sbo/507program.htm

State SBEAPs help small businesses and assistance providers understand environmental requirements and sustainable business practices through workshops, trainings and site visits.

EPA's Tribal Portal

www.epa.gov/tribalportal/

The Portal provides access to information on environmental issues, laws, and resources related to federally recognized tribes.

EPA Compliance Incentives

EPA provides incentives for environmental compliance. By participating in compliance assistance programs or voluntarily disclosing and promptly correcting violations before an enforcement action has been initiated, businesses may be eligible for penalty waivers or reductions. EPA has two such policies that may apply to small businesses:

EPA's Small Business Compliance Policy

www2.epa.gov/enforcement/small-businesses-and-enforcement

This Policy offers small businesses special incentives to come into compliance voluntarily.

EPA's Audit Policy

www2.epa.gov/compliance/epas-audit-policy

The Policy provides incentives to all businesses that voluntarily discover, promptly disclose and expeditiously correct their noncompliance.

Commenting on Federal Enforcement Actions and Compliance Activities

The Small Business Regulatory Enforcement Fairness Act (SBREFA) established a SBREFA Ombudsman and 10 Regional Fairness Boards to receive comments from small businesses about federal agency enforcement actions. If you believe that you fall within the Small Business Administration's definition of a small business (based on your North American Industry Classification System designation, number of employees or annual receipts, as defined at 13 C.F.R. 121.201; in most cases, this means a business with 500 or fewer employees), and wish to comment on federal enforcement and compliance activities, call the SBREFA Ombudsman's toll-free number at 1-888-REG-FAIR (1-888-734-3247).

Every small business that is the subject of an enforcement or compliance action is entitled to comment on the Agency's actions without fear of retaliation. EPA employees are prohibited from using enforcement or any other means of retaliation against any member of the regulated community in response to comments made under SBREFA.

Your Duty to Comply

If you receive compliance assistance or submit a comment to the SBREFA Ombudsman or Regional Fairness Boards, you still have the duty to comply with the law, including providing timely responses to EPA information requests, administrative or civil complaints, other enforcement actions or communications. The assistance information and comment processes do not give you any new rights or defenses in any enforcement action. These processes also do not affect EPA's obligation to protect public health or the environment under any of the environmental statutes it enforces, including the right to take emergency remedial or emergency response actions when appropriate. Those decisions will be based on the facts in each situation. The SBREFA Ombudsman and Fairness Boards do not participate in resolving EPA's enforcement actions. Also, remember that to preserve your rights, you need to comply with all rules governing the enforcement process.

EPA is disseminating this information to you without making a determination that your business or organization is a small business as defined by Section 222 of the Small Business Regulatory Enforcement Fairness Act or related provisions.